

Ms. Lois Cashell
Secretary
Federal Energy Regulatory Commission
825 North Capitol Street, N.E.
Washington, DC 20426

Dear Ms. Cashell:

The Department of Transportation's Office of Pipeline Safety (OPS) has the following comments on the Draft Environmental Impact Statement (DEIS), Yukon Pacific LNG Project, May 1993, FERC/EIS-0071D, Yukon Pacific Corporation (YPC) Docket Nos. CP88-105-000 and CP88-105-001. The DEIS concerns the proposed Liquefied Natural Gas (LNG) Plant and Marine Terminal Site at Port Valdez (Anderson Bay), Alaska for the Trans-Alaska Gas System (TAGS). The comments address the Department's LNG safety standards contained in 49 CFR part 193.

Emergency Access Road

Starting on Page 4-68 of the DEIS, there is a discussion of the 49 CFR 193.2055 requirement for "ease of access" to provide for fire fighting equipment to reach an LNG terminal site, controlling LNG spill associated hazards, and for evacuation of personnel, and the requirement for an all-weather vehicular road for accessibility to an LNG plant contained in the National Fire Protection Standard NFPA 59A. YPC is proposing waterborne transportation for primary access/egress to the LNG plant. A concern is expressed in the DEIS concerning both compliance with the "ease of access" requirement of 49 CFR 193.2055 as well as the ability of waterborne access to meet the all-weather vehicular road requirement in NFPA 59A.

Section 193.2055 states in part ". . . A site must provide ease of access so that personnel, equipment, and materials from offsite locations can reach the site for fire fighting or controlling spill associated hazards or for evacuation of personnel." OPS wants to comment that the "ease of access" requirement is a performance standard with the method of access not prescribed. The regulation's history makes it clear that a road is not required for "ease of access" if another method of access can be used to comply with 49 CFR 193.2055. The issue of whether or not waterborne transportation for the primary access/egress to the plant proposed by YPC would comply with 49 CFR 193.2055 has not been addressed by OPS.

Dispersion Exclusion Zone

The prohibited activities contained in 49 CFR 193.2059 within an established flammable vapor dispersion exclusion zone are stated on Page 4-78 of the DEIS. They include in part:

"Outdoor areas occupied by 20 or more persons during normal use, such as beaches, playgrounds, outdoor theaters, other recreational areas, or other places of assembly."

OPS wants to comment that the 20 person limitation cited does not apply to transient travel, including travel offshore, within the exclusion zone. Examples of such transient travel through the exclusion zone offshore would include travel by fishing boats or cruise ships. The regulations in 49 CFR Part 193 contain no travel restrictions within exclusion zones.

A public inquiry to us on this subject asked how a vessel travelling in the exclusion zone would be warned of an accident involving LNG. Under 49 CFR 193.2509(b)(2) an operator is required to be able to recognize an uncontrollable emergency and take action to minimize harm to the public and personnel, including prompt notification of appropriate local officials of the emergency and possible need for evacuation of the public in the vicinity of the LNG plant. OPS expects YPC to include offshore vessels in their emergency notification/evacuation plan.

Thank you for the opportunity to comment on the DEIS. If you have any questions on these comments, please contact Lloyd W. Ulrich of my staff at (202) 366-4556.

Sincerely,

George W. Tenley, Jr.
Associate Administrator for
Pipeline Safety

cc: Mr. Robert Arvedlund, Chief
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